

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE APPLICATION	)	
OF DELMARVA POWER AND LIGHT	)	PSC Docket No. 14-193
COMPANY, EXELON CORPORATION,	)	
PEPCO HOLDINGS, INC., PURPLE	)	
ACQUISITION CORPORATION, EXELON	)	
ENERGY DELIVERY COMPANY, LLC AND	)	
NEW SPECIAL PURPOSE ENTITY FOR	)	
APPROVALS UNDER THE PROVISIONS OF	)	
26 DEL. C. §§ 215 AND 1016	)	
(FILED JUNE 18, 2014)	)	
	)	

**PETITION TO INTERVENE  
OF THE INDEPENDENT MARKET MONITOR FOR PJM**

Pursuant to Rule 21 of the Rules of Practice and Procedure of the Delaware Public Service Commission, Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM<sup>1</sup> ("Market Monitor"), hereby petitions the Commission for leave to intervene as a party in this matter.

In support of its petition for leave to intervene, the Market Monitor states the following:

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<sup>1</sup> PJM Interconnection, L.L.C. ("PJM") is a Commission-approved Regional Transmission Organization. Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff ("OATT") or the PJM ("OA").

1. The Market Monitor is an organization created to objectively monitor the competitiveness of PJM markets, funded by the members of PJM Interconnection, L.L.C.<sup>2</sup>
2. The Open Access Transmission Tariff (OATT) of PJM Interconnection, L.L.C., requires that the Market Monitor, among other things, monitor “Compliance with the PJM Market Rules,” “Actual or potential design flaws in the PJM Market Rules,” Structural problems in the PJM Market that may inhibit a robust and competitive market,” and “The potential for a Market Participant to exercise market power or violate any of the PJM Rules.”<sup>3</sup>
3. As this proceeding involves a review of the impact on markets of Delmarva Power’s application seeking approval of a proposed merger that the Federal Energy Regulatory Commission and individual state commissions must approve, it implicates matters within the Market Monitor’s purview.
4. The Market Monitor’s interest in the outcome of this proceeding is in ensuring that the merger will not harm the competitiveness of PJM markets.
5. The Market Monitor has a substantial interest in this proceeding because it has the exclusive duty to perform the market monitoring function for PJM in accordance with the duties required by the PJM Tariff. No other party can adequately represent the Market Monitor’s interests.
6. The Market Monitor requests that it be added to the official service list and that all papers, pleadings, and notices be served on undersigned counsel, Jeffrey W. Mayes.

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<sup>2</sup> OATT Schedule 9-MMU.

<sup>3</sup> OATT Attachment M §§ II & IV.B 1-4.

For the foregoing reasons, the Market Monitor respectfully requests that it be granted leave to intervene in this proceeding as a party for all purposes.

Respectfully submitted,



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Jeffrey W. Mayes

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Dated: July 28, 2014

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Eagleville, Pennsylvania,  
this 28th day of July, 2014.



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Jeffrey W. Mayes

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